

**From:** [Commenter 10]

**Sent:** Fri 2/4/2022 12:45 PM

**To:** Illinois-RFP <Illinois-RFP@nera.com>

**Subject:** Draft Indexed REC Contract

Hello,

Below are my comments about the Draft Indexed REC Contract published by the IPA on January 20, 2022.

Disclaimers: These comments are only about technical coherence. I am speaking solely for myself, on behalf of no entity. In my professional legal work, I represent various environmental organizations and renewable energy industry interests in matters outside Illinois. I have not shared or discussed these comments with anyone.

\* My prior comments about Sections 1.48 and 1.49 of the Second Draft ABP REC Contract 1 from November 18, 2021 apply to Sections 1.34 and 1.35, respectively, of this Draft Indexed REC contract.

\* Exhibit F-1, second paragraph, first sentence should be edited in two places:

"For example, if the Annual Quantity is 3,650 RECs and the Delivery Term starts on August 1, 2020, then the Delivery Term is August 1, 2020 through July 31, 20~~35~~40 and, for each day during the 365-day period of August 1, 2020 through July 31, 2021, the Daily Quantity can be reduced from 10 RECs to 5 RECs."

[I think the contract term is supposed to be 20 years, according to the definitions of Delivery Term, Acceptable Vintage Period, & Latest Vintage Month, as well as page 354 of Public Act 102-0662 (IPAA § 1-75(c)(1)(G)(v)).]

That is all; nice work!

Thank you,

[Commenter 10]

[Commenter 10]'s contact information